



Glass Gardens Inc. and affiliated companies

244 West Passaic Street • Rochelle Park, New Jersey 07662

Phone: (201) 843-1364 • Fax: (201) 843-7657

April 4, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

This letter is in response to your request for comments on the USDA's Country of Origin Labeling (COL) Voluntary Guidelines.

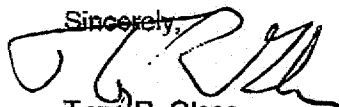
I am the owner of a family owned supermarket chain with stores located in New Jersey and New York. It is my understanding that we are being charged with the unprecedented responsibility to inform customers of the country of origin for all non-processed beef, pork, lamb, fresh/frozen fruits and vegetables, fresh/frozen seafood (for which we must also identify the method of production), and peanuts sold in our store(s).

Our associates cannot look at a package of meat to determine where an animal was born, raised, or slaughtered, neither can they determine where an apple is grown nor where a fish was caught or raised; yet under the guidelines we are responsible for providing that information to our customers. As you develop regulations, we encourage you to be flexible in labeling or signage requirements. Non-compliance for something we have little control over could ultimately result in a \$10,000.00 fine for incorrectly or non-labeled products. That is blatantly unfair.

During the regulation development process we ask that you hold suppliers, not retailers, accountable for labeling their products. The suppliers must be responsible for accurate information provided to retailers and consumers. There is no process proposed for the retailer to verify the accuracy of information provided by the suppliers.

Under the voluntary guidelines, records must be maintained for 2 years. I cannot envision how we can possibly retrieve a record of a particular apple that we sold 2 years ago. I urge you to implement reasonable record keeping requirements, and that the record keeping be ultimately the responsibility of the supplier.

Sincerely,



Terry R. Glass
Co-CEO

ShopRite Supermarkets

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